



John E. Benedict
Senior Attorney

September 3, 2003

Federal Regulatory Affairs
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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Communication

Implementation of the Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996
CC Docket No. 96-128

Dear Ms. Dortch:

I spoke separately by telephone with Robert Tanner and Darryl Cooper of the Wireline Competition Bureau yesterday and today, respectively, about the above-captioned docket. Our conversations addressed MCI's proposal, outlined in its June 23, 2003 comments and August 20, 2003 ex parte notice. MCI's proposal would give switch-based resellers ("SBRs") the option to report and pay payphone service providers ("PSPs") directly for coinless payphone calls, if an independent auditor confirms that the SBR has reliable tracking and compensation systems and processes. The first-switch interexchange carrier ("FS-IXC") would not be responsible for those SBRs' tracking, reporting, and compensation obligations. For SBRs that fail to pass an auditor's review, or choose not to do so, the FS-IXC would report and compensate PSPs -- and surcharge the SBR -- based on answer supervision on the FS-IXC network.

I explained that Sprint likely would not object to rules based on this proposal, provided that the FS-IXC has flexibility to set the rate and conditions for its service to the SBR and is not a financial guarantor of an SBR's obligation to PSPs if its own bills to an SBR are unpaid.

I also noted that Sprint opposes Qwest's proposed certification and data reporting requirements, as outlined in its August 28, 2003 ex parte notice. Qwest's proposal would impose on all carriers truly massive data reporting requirements that are far disproportionate to any need for the information.

Pursuant to the requirements of Section 1.1206 of the Commission's rules, we are filing an electronic copy of this notice for addition to the docket.

Sincerely,

John E. Benedict

cc: Michelle Carey
Jeffrey Carlisle
Gregory M. Cooke
Darryl Cooper
Joshua E. Swift
Robert S. Tanner
Henry L. Thaggert III
Jack Yachbes